

UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO

ANGEL ORTIZ ANGLERO AND REINALDO
ILARAZA MEDINA *
* CIVIL NO. 97-2437 (CCC)

Plaintiffs
*
* JURY TRIAL REQUESTED
vs.

CROWLEY TOWING AND TRANSPORTATION
COMPANY AND SEAFARERS INTERNATIONAL
UNION OF NORTH AMERICA, ATLANTIC,
GULF, LAKES AND INLAND WATERS
DISTRICT, AFL-CIO *

Defendants *

* * * * * * * * * * * * * * * * *
ORLANDO RODRIGUEZ et al. *

Plaintiffs
* CIVIL NO. 98-1548 (CCC)
* JURY TRIAL REQUESTED
vs.

CROWLEY TOWING AND TRANSPORTATION
COMPANY AND SEAFARERS INTERNATIONAL
UNION OF NORTH AMERICA, ATLANTIC,
GULF, LAKES AND INLAND WATERS
DISTRICT, AFL-CIO *

Defendants *

* * * * * * * * * * * * * * * * *

MOTION FOR SUMMARY JUDGMENT

TO THE HONORABLE COURT:

Plaintiffs in CIVIL NO. 97-2437, by and through counsel,
respectfully move this Court, pursuant to Rule 56 of the Federal
Rules of Civil Procedures, to grant summary judgment for plaintiffs
in the instant case. A Statement of Uncontested Material
Facts and supporting Memorandums is accompanied.

WHEREFORE, plaintiffs respectfully request the Court to
grant their motion for summary judgment.

I certify that on this same date I sent copy of the foregoing motion to attorney Ana Rosa Biascoechea, to P.O. Box 195332, San Juan, PR 00919-5332; to attorney Raquel M. Dulcaides, to fax 751-4068 and to P.O. Box 366104, San Juan, PR 00936-6104; to Ellen Silver, Esq., 5201 Auth Way, Camp Springs, Maryland 20746 and to attorney J.H. Zidell, to fax 305-865-7167 and to City National Bank Building, 300 71 St. #605, Miami Beach, FL 33141.

Respectfully submitted, this 30 day of August 2004.



LUIS AMAURI SUAREZ ZAYAS, ESQ.
US DISTRICT COURT NO. 118903
CALLE FELIPE GOYCO 503
SAN JUAN, PUERTO RICO 00915
TELS. 726-5592, 761-3037
Fax 787-726-0954